Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of	)	
Misuse of Internet Protocol (IP) Captioned Telephone Service	)	GC Docket 13-24
Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities	)	GC Docket 03-123

COMMENTS OF RAZ MOBILITY, LLC ON IP CTS MODERNIZATION AND REFORM

RAZ Mobility, LLC ("RAZ Mobility") submits these comments in response to the Federal Communications Commission's ("Commission") *IP CTS Modernization and Reform FNPRM* ("FNPRM").[1]

I. Introduction

RAZ Mobility is a company that sells mobile assistive technology solutions to State equipment distribution programs and the United States Department of Veterans Affairs. The assistive technology is designed to assist people with hearing, speech, mobility and vision disabilities.

[1] *Misuse of Internet Protocol Captioned Telephone Service*; *Telecommunications Relay Services and Speech-to-Speech Services for Individuals with Hearing and Speech Disabilities*, Report and Order, Declaratory Ruling, Further Notice of Proposed Rulemaking, and Notice of Inquiry, FCC 18-79 (June 8, 2018) (*IP CTS Modernization and Reform FNPRM*).

II. TRS Programs Should Assume Responsibility for Determining Consumer Eligibility for IP CTS

RAZ Mobility supports the Commission's proposal to require state TRS programs to determine eligibility for IP CTS.[2] Further, RAZ Mobility agrees "that each assessment include a functional assessment of each applicant's communication needs, including the extent to which the individual would be able to achieve functionally equivalent telephone service by using an amplified telephone or other assistive technology."[3]

RAZ Mobility is concerned, however, that the Commission's NPRM is overly focused on landline captioned phones and that it is therefore not seeing certain complexities. IPC CTS is increasingly accessed on smartphones and tablets; there is both indirect and direct evidence that this is the case.

First, the indirect evidence: approximately half of all state equipment distribution programs now provide mobile devices to deaf or hard of hearing consumers. These state programs are increasingly popular and growing in number. For example, Tennessee and South Carolina are currently conducting pilots to determine whether they should include mobile equipment in their programs. States that are not providing mobile devices have experienced a significant decline in demand for their equipment. For example, according to the Florida Specialized Telecommunications Equipment Distribution Program's 2016 annual report, the program distributed a high of 24,299 new devises in 2010-2011, and only 12,620 devices in 2015-2016; a drop of nearly 50 percent. And in the 2013 Report, the Florida Public Utility Commission noted that "the reduction in landlines impacted the available target audience." Deaf

---

2 *Id.* ¶123.

3 *Id.* ¶122.

and hard of hearing consumers who switch to smartphones and tablets access IP CTS on their mobile devices.

The direct evidence could not be more clear: consumers are downloading IP CTS apps in large numbers. The IP CTS providers offer both android and iOS mobile applications. While Apple's App Store does not provide the number of app downloads, the Google Play Store does. The Google Play Store shows that the ClearCaptions app has between ten thousand and fifty thousand downloads; the Hamilton CapTel app also has between ten thousand and fifty thousand downloads; InnoCaption has between five thousand and ten thousand downloads; and the Sprint IP Relay application has been downloaded between fifty thousand and one hundred thousand times. The number of downloads of IP CTS apps on Apple's App Store may be significantly higher.

Accordingly, when performing "functional assessments" and examining whether there are superior alternatives to IP CTS, such as amplified phones, the state equipment distribution programs should also consider mobile equipment. For example, they should consider whether headphone amplifiers or neck loops for smartphones and tablets are functionally equivalent to IP CTS. RAZ Mobility recently started to sell an Amplification Set to state equipment distribution programs, which includes a headphone amplifier and either ear buds or over-the-ear headphones. Similarly, a company called Clarity sells a headphone amplifier called the Sempre Mini.[4]

The challenge is that because approximately half of all states *do not* include mobile equipment in their programs, they may not include headphone amplifiers or neck loops in their functional assessments. This may cause States to steer consumers who want to use mobile devices to IP CTS apps, rather than headphone amplifiers and neck loops. To avoid this

[4] *See*, https://teltex.com/clarity-sempre-mini/

outcome, the Commission should require that all state equipment distribution programs, including those that do not include mobile equipment in their program, nevertheless include mobile equipment, such as headphone amplifiers and neck loops, in their assessments.

State equipment distribution programs differ significantly in experience, operations, resources and expertise. Accordingly, RAZ Mobility supports the proposition that state assessments should "comport with certain standards and practices established by the Commission for nationwide application."[5] Absent such standards, functional assessments could be influenced by relationships between the managers of the state equipment programs and IP CTS providers or vendors of the alternative assistive technology.

Such standards should include a list of technology categories that state equipment distribution programs must incorporate in their functional assessments. For example, programs should be required to incorporate amplified landline phones, as well as headphone amplifiers for mobile devices. States, however, should be provided the flexibility to include in their functional assessments, equipment in technology categories that the Commission does not proscribe. In other words, States should be permitted to go beyond the required list of technology categories, but not be permitted to exclude proscribed technology categories.

III. Alternative Technologies and Services to IP CTS

Simply performing an intellectual exercise and learning whether and how some individuals may substitute lower cost alternative technologies and services for IP CTS serves little purpose.[6] RAZ Mobility proposes that the Commission or state equipment distribution programs educate registered users of IP CTS on new technologies, such as real time text and

[5] *See*, *IP CTS Modernization and Reform FNPRM,* ¶124.
[6] Id. ¶154 (seeking comment on "the extent to which alternative communication services and applications, which are not funded through the TRS program, can complement or reduce reliance on IP CTS").

solutions that use audio personalization. Technology is moving rapidly and "touching" a consumer once during the functional assessment is not sufficient.

The Commission or state equipment distribution programs can accomplish such education through a newsletter emailed to registered users of IP CTS. Such education should reduce the use of IP CTS.

Respectfully Submitted,

Robert Felgar, CEO
RAZ Mobility, LLC
1934 Old Gallows Rd, Suite 350
(703) 517-9912
robert@razmobility.com